

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

KENNETH CHAMBERS (NYBN 5559885)
Assistant United States Attorney

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
kenneth.chambers@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|---------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | NO. 4:23-MJ-70880-MAG |
| |) | |
| Plaintiff, |) | STIPULATION TO CONTINUE |
| v. |) | PRELIMINARY HEARING AND |
| ANTOYNE TERRELL BULLOCK, |) | EXCLUDE TIME FROM AUGUST 22, |
| |) | 2023 TO AUGUST 29, 2023 AND |
| Defendant. |) | [PROPOSED] ORDER |
| |) | |
| |) | |
| |) | |

The above-captioned case is currently scheduled for a preliminary hearing/arraignment on **August 22, 2023, at 10:30 am**. The government has provided defense counsel with discovery. The government will also be providing defense counsel with additional discovery materials. Accordingly, the parties would like to continue the hearing to **August 29, 2023**, to allow additional time for the parties to engage in discussions about potential resolution prior to Indictment, and for defense to review discovery. Furthermore, the government has additional discovery to produce to defense counsel, as the discovery in this case is voluminous. Believing such discussions to be in the interests of justice, the parties represent that good cause exists and therefore agree to extend the deadlines for a preliminary hearing under Rule 5.1(d) of the Federal Rules of Criminal Procedure

1 and exclude time under the “Speedy Indictment” provisions of the Speedy Trial Act. *See* 18 U.S.C.
2 § 3161(b). Accordingly, the parties hereby stipulate and agree to a new hearing date on **August 29,**
3 **2023**, for preliminary hearing or arraignment, and status on detention to discuss the next steps in the
4 defendant’s treatment program before the Duty Magistrate Judge. The parties also stipulate and
5 agree to request that the time between **August 22, 2023**, and **August 29, 2023**, be excluded to
6 facilitate discussions related to resolution prior to Indictment, and for effective preparation pursuant
7 to 18 U.S.C. § 3161(h)(7).
8

9 IT IS SO STIPULATED.

10 DATED: August 21, 2023

/s/

KENNETH CHAMBERS
Assistant United States Attorney

11
12
13 DATED: August 21, 2023

/s/

JOYCE LEAVITT
Counsel for Defendant Antoyne T. Bullock

~~[PROPOSED]~~ ORDER

The above-entitled matter is currently scheduled for preliminary hearing/arraignment on **August 22, 2023, at 10:30 am**. The parties are requesting a continuance to **August 29, 2023**. The parties are seeking this continuance in order to engage in discussions about potential resolution of this matter prior to Indictment, and for defense counsel to review discovery that has been produced. Furthermore, there are still outstanding discovery materials that the government will be producing to the defense. Defense counsel will need additional time to review the additional discovery. With the consent of the United States, and taking into account the public interest in the prompt disposition of criminal cases, the court sets the preliminary hearing to the date set forth below, and based on parties' showing of good cause, finds good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act (based on the exclusions set forth above). *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

The parties have agreed to waive and exclude time for the preliminary hearing under the Speedy Trial Act. The government has no objection to this proposed continuance. Therefore, for good cause shown the hearing currently scheduled on **August 22, 2023**, shall be vacated. The matter shall be continued until **August 29, 2023**. The time shall be excluded from the running of the speedy trial clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7).

IT IS SO ORDERED.

Dated: 8/21/22

By: 

HON. DONNA M. RYU
CHIEF MAGISTRATE JUDGE